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ARTISTIC DIRECTOR
Eric Schaeffer
MANAGING DIRECTOR
Maggie Boland

signature

Monday, January 5, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Signature Theatre, located in Arlington, VA, a 25-year-old organization that provides approximately 500 performances a year to 110,000 audience members along with education programs and community events for 7,500 people of all ages annually, in addition to providing an economic engine for a vibrant neighborhood and serving as a hub for the creation of new theatrical work, I write with concern about protection for our wireless microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This could leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Signature depends on our wireless devices all year round, using up to 24 wireless microphones in our Max Theatre and up to 6 in our Ark Theatre space. We use up to two channels for in-ear communications/IEMs and up to 12 channels of wireless intercom for cue and control devices. In a typical performance, we will use anywhere from 20-30 channel units in our Max Theatre and 10-15 channel units in our Ark Theatre. Of our estimated 500 annual performances, all of them use wireless devices. We use 22 low UHF bands (channels 14-36, 470 to 608 MHz) and 22 high UHF bands (channels 38-51, the 600 MHz band, 614 MHz to 698 MHz). Depending on the device, our microphones are able to tune to multiple frequencies ranging from 10-30MHz. All of these wireless devices described are analog and range between TV stations 15 and 51 (476MHz – 698MHz) but are variable and are placed outside of local TV stations' ranges. Signature owns 100% of our wireless equipment used. With healthy maintenance, the average lifespan of our equipment ranges from 15-20 years.

The move out of the 700 MHz Band cost Signature \$55,000 in new equipment costs, which does not include the cost of labor or brainpower required for this change, and we are still in the process of replacing outdated devices. Not only do we need to purchase equipment that is compliant with the new frequencies, we need devices that meet the quality to satisfy our performance standards. Moving out of the TV band for our organization is unrealistic as there is no reasonable equivalent available in other RF bands that is affordable and/or reliable enough for us to replace our current wireless infrastructure.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am gravely concerned about the cost of once again replacing my theatre's sound equipment – this would be a true hardship for Signature, one that would seriously compromise our ability to fulfill our mission.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,

A handwritten signature in blue ink, reading "Maggie Boland". The signature is fluid and cursive, with the first name "Maggie" written in a larger, more prominent script than the last name "Boland".

Maggie Boland
Managing Director
Signature Theatre